

Alan Ruddy, Esq., Assistant County Counsel  
Attorney ID#002411975  
Office of the Essex County Counsel  
Hall of Records, Room 535, 465 Dr. Martin Luther King, Jr., Blvd., Newark, NJ 07102  
(973) 621-5021  
(Attorney for Defendant, County of Essex, also improperly pled as Essex County  
Department of Corrections, Essex County Adult Corrections Center, Essex County Adult  
Corrections Center Director Al Ortiz, Sgt. John Lopez, improperly plead as Sheriff's  
Officer Lopez)

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(NEWARK)**

Civil Action No.  
Removed from:

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION: ESSEX COUNTY  
: DOCKET NO. ESX-L-6295-21

MOISES ECHEVARRIA,

Plaintiff,

vs.

Civil Action

COUNTY OF ESSEX, ESSEX COUNTY:  
DEPARTMENT OF CORRECTIONS;  
ESSEX COUNTY ADULT  
CORRECTIONS CENTER; ESSEX  
COUNTY ADULT CORRECTION  
CENTER DIRECTOR AL ORTIZ; NEW  
JERSEY DEPARTMENT OF  
CORRECTIONS; SHERIFF'S OFFICER  
LOPEZ; ABC SHERIFF'S OFFICERS  
(fictitious defendants); DEF COUNTY  
GUARDS (fictitious defendants); GHI  
PUBLIC ENTITIES 1-5 (fictitious  
Defendants); JKL PRIVATE ENTITIES  
1-5, (fictitious defendants) and JOHN/  
JANE DOES 1-10 (fictitious defendants),

Defendants.

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**NOTICE OF FILING PETITION  
TO UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
NEW JERSEY FOR REMOVAL  
28 U.S.C. §1446(d)**

To: Clerk of the United States District Court  
District of New Jersey  
Martin Luther King Jr. Courthouse  
50 Walnut Street  
Newark, NJ 07101

On Notice to: Clerk, Essex County Superior Court  
Civil Action Division  
Veterans Courthouse – Room 131  
Newark, NJ 07102

John H. Sanders, Esq.  
655 Shrewsbury Avenue, Suite 314  
Shrewsbury, NJ 07702  
(Attorney for Plaintiff)

SIR/MADAM:

PLEASE TAKE NOTICE that the defendants, County of Essex, et al.  
on this 1st day of September, 2021 filed a Notice of Removal, a copy of which is  
attached hereto, in the United States District Court for the District of New Jersey, to  
remove the above-captioned matter from the Superior Court of New Jersey, Essex  
County, to the United States District Court for the District Court of New Jersey.

You are also advised that the defendants, upon filing of said Notice of Removal,  
filed a copy of the Notice with all counsel of whom defendants have notice has filed  
pleadings in this case.

Courtney M. Gaccione  
Essex County Counsel  
(Attorney for defendant,  
County of Essex)

s/Alan Ruddy  
Alan Ruddy  
Assistant County Counsel

Dated: September 1, 2021

**CERTIFICATION OF SERVICE**

I hereby certify that the original of the Notice of Petition to the Clerk of the United States District for the District of New Jersey for the Removal and the Notice of Removal were filed with Clerk of the United States District Court for the District of New Jersey, Newark Vicinage, and the Clerk of the Essex County Superior Court of New Jersey, Civil Division, and counsel of record within the time prescribed by the rules of Court.

s/Alan Ruddy  
Alan Ruddy  
Assistant County Counsel

Dated: September 1, 2021